

# SEYFARTH SHAW LLP

Writer's direct phone

(312) 460-5817

Writer's e-mail

drowland@seyfarth.com

ENDORSED  
ORDER

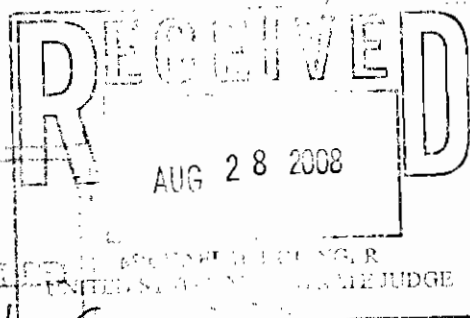
All discovery except that required to be undertaken through the Hague Convention is to be completed by Oct. 10, 2008. Counsel are to submit a written status report to the Court by Oct. 17, 2008.

August 28, 2008

131 South Dearborn Street  
Suite 2400  
Chicago, Illinois 60603  
(312) 460-5000  
fax (312) 460-7000  
www.seyfarth.com

## VIA HAND-DELIVERY

The Honorable Michael H. Dolinger  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 1670  
New York, NY 10007



Re: **Rosemary O'Mahony v. Accenture Ltd. and Accenture LLP (Case No. 07 CV 7916)**

Dear Judge Dolinger:

We represent the defendants in the above-referenced matter. This letter serves as the parties' joint application for a formal extension of the September 9 discovery deadline set forth in the initial case management order. The parties respectfully request a 31 day extension – to October 10, 2008, to complete all discovery in both the U.S. and in the United Kingdom.

At the August 11, 2008 conference with the parties, the parties indicated that plaintiff would be deposed last week (that deposition has been completed) and Your Honor had instructed defendants to produce witnesses for deposition during the last week of August, or, if those witnesses were unavailable, to schedule them for after plaintiff's counsel return from his vacation on September 9. One of defendants' witnesses is being deposed today. Of the three others requested by plaintiff, two are on vacation and the other had unavoidable client commitments on the remaining days this week prior to plaintiff's counsel's scheduled vacation. Defendants' counsel also had one day of vacation scheduled for August 30. A potential fifth witness, a retired Accenture executive located in California, responded to defendants' inquiries this past Friday and has agreed to make himself available for deposition on September 25.

In the meantime, plaintiff has requested that the Court issue a Request for International Assistance pursuant to the Hague Convention and the parties have agreed to a firm deposition schedule for the remaining U.S. executives as well as for the two Accenture U.K. executives plaintiff has requested to depose in London. Under the parties' proposed revised discovery schedule, all non-French depositions would be completed by October 10, well before the Hague



The Honorable Michael H. Dolinger  
August 28, 2008  
Page 2

Convention process will allow for written discovery in France and the four French depositions. Obviously, the parties do not control when the French portion of discovery can be completed, but all of the depositions of the current Accenture-France employees will be coordinated in a condensed manner upon approval of the French Ministry of Justice.

This is the parties' first request for an extension of the discovery deadline. We thank Your Honor for your consideration of this request.

Respectfully submitted,

SEYFARTH SHAW LLP

A handwritten signature in black ink that reads "David Rowland / COT".

David J. Rowland  
(Admitted Pro Hac Vice)

cc: David Mair, Esq. (by facsimile)